

CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT

SEPA Threshold Determination
for the
2006 Comprehensive Plan Annual Amendments

Project Sponsor: City of Seattle Department of Planning and Development (DPD)

Location of Proposal: The amendments relate to the City's Comprehensive Plan, which pertains to the entire City.

BACKGROUND

Proposal Description

The proposal consists of several amendments to the Comprehensive Plan, as summarized below.

Updates to Neighborhood Plans, Urban Centers, and Potential Annexation Areas

Addition to Uptown Urban Center

- A. Add a triangle-shaped area bounded by Aurora Avenue, Denny Way, and Broad Street to the Uptown Urban Center.

South Lake Union

- B. Update the South Lake Union neighborhood plan policies within the Comprehensive Plan, since it has been designated status as an Urban Center. Amend the Future Land Use Map to change the designation of a twelve-block area in the South Lake Union urban center from "Industrial Area" to "Commercial/Mixed Use Area."

Station Area Planning

- C. Amend the Roosevelt neighborhood plan policies within the Comprehensive Plan to reflect the identification of a future light rail station.
- D. Remove a reference to the now-canceled light rail station in the First Hill neighborhood plan.

Potential Annexation Area

- E. Designate the North Highline area as a Potential Annexation Area.

Open Space Policy Changes

Open Space Requirements

- F. Amend the open space and required yards policy to limit its application only to areas outside urban centers in recognition of proposals that will address urban center open space in other ways, such as through impact fees.

Shoreline-Related Policy Changes

Ferry Terminal

- G. Amend goals and policies to accommodate the possibility of future commercial development as part of a ferry terminal upgrade on Colman Dock.

Central Waterfront

- H. Amend Shoreline policies to enable construction, long-term temporary relocation of utilities, and other aspects of the Alaskan Way Viaduct and seawall replacement.

Other Future Land Use Map Changes

Dearborn Street (Goodwill) Vicinity

- I. Amend the Future Land Use Map to change the designation of land in this vicinity from “Industrial Area” to “Commercial/Mixed Use Area.” The vicinity includes the area between 12th Avenue S., S. Weller Street, Rainier Avenue S., and S. Dearborn Street.

ANALYSIS - OVERVIEW

The following describes the analysis conducted to determine if the proposal is likely to have a *probable significant adverse environmental impact*. This threshold determination is based on:

the proposal, as described above and in memoranda;
the information contained in the *SEPA checklist*;
additional information, such as analyses prepared by City staff; and
the experience of DPD analysts in reviewing similar documents and actions.

ELEMENTS OF THE ENVIRONMENT

Adoption of the possible amendments would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below generally evaluates the potential long-term impacts that might conceivably result from differences in future development patterns due to the proposed amendments.

Natural Environment

Earth, Air, Water, Plants and Animals, Environmental Health

Updates to Neighborhood Plans, Urban Centers and Potential Annexation Areas

Five items, A-E, relate to updating neighborhood plan policies contained in the Comprehensive Plan, and newly designating two areas—adding one area to an urban center, and another as a potential annexation area. As non-project actions, no direct impacts to the environment would occur.

The question is: would these shifts in policy statements or designations result in any meaningful differences in future development patterns that could generate significant adverse impacts to the natural environment? Even though the policy statements and designations do not necessitate specific zoning changes or development activity, they could have a relationship to future growth, in that future decisions could subsequently be made that would encourage additional growth or different growth patterns in the affected areas. Therefore, Items A-C should be examined with respect to potential natural environmental impacts.

In reflecting upon the status of City codes and regulations that protect water, environmental critical areas and habitat, and those that regulate land use and zoning, the conclusion reached is a minimal potential for long-term significant adverse natural environmental impacts due to these proposed changes. In the locations affected by Items A-C, the character of the environment is already relatively dense and urban-style development with fully developed infrastructure networks, and only a limited area in steep slopes. In that context, environmental impacts are largely confined to grading of single properties with new development and the stormwater runoff-related impacts that can potentially occur, such as erosion, sedimentation and pollutant loading into local stormdrains and sewers. City regulations define how those impacts can be avoided or minimized through implementation of construction controls. Steep slopes would be protected by the City's environmental critical areas regulations. From a regional perspective, the proposed changes would tend to support growth in urban centers and urban villages, which would tend to have positive natural environmental implications in avoiding environmental impacts of sprawling development in far-flung locations.

Item D, updating the policies to reflect an elimination of a previously-planned light rail station on First Hill has no significant adverse environmental implications. Item E, placing a potential annexation area map into the Comprehensive Plan, is categorically exempt from SEPA review (see SMC 25.05.800 F).

Open Space Policy Changes

The proposal in Item F would accommodate other methods of achieving open space in urban centers, different from the standard approach of yards and required amounts of on-site open space. The alternative methods, such as impact fees, would be likely to result in additional public open space within urban centers, in arrangements that provide opportunities for recreation and “breathing space.” To the extent that this occurs, the adverse environmental implications

include primarily minor grading activities that would be needed to build or shape park space, and the potential for use of chemical applications to maintain or clean such areas. To a lesser degree, it is possible that future park spaces would need to remediate or otherwise treat degraded conditions or contaminants in soils before or during construction, prior to recreational use. These types of adverse impacts can be mitigated at the time of their permitting, and therefore no significant adverse environmental impacts are identified for this proposal.

Shoreline-Related Policy Changes

Ferry Terminal

Item G consists of revisions to shoreline goals and policies that would accommodate additional non-water-dependent commercial development at or adjacent to the Colman Dock regional public ferry terminal. Phrasing in the changes supports such development if public access to and recreational enjoyment of the shoreline is enhanced. This future possible development has implications for earth, water and fisheries aspects of the natural environment, in that a variety of actions affecting shoreline areas could occur. These would likely include grading in areas on dry land or dredging in areas covered by water, various construction activities such as placing pilings, rockeries and new structures over or near the water, potentially reshaping or creating new shorelines and placing or relocating utilities over the water.

At least some of these types of impacts are likely to be considered probable significant adverse impacts. However, as part of phased environmental review, other studies (such as an environmental impact statement) are expected to be published at a later date, which will contain impact analysis and identification of mitigation measures. At this time, the threshold determination for Comprehensive Plan changes can be satisfied through a mitigation measure that indicates the City should implement relevant project-specific mitigation for the development proposal at Colman Dock.

Central Waterfront

Item H would amend Shoreline policies to enable flexibility in construction techniques, long-term temporary relocation of utilities and other activities that would aid the Alaskan Way Viaduct and seawall replacement. Similar to the analysis for the ferry terminal proposal above, this proposal is likely to generate some types of natural environmental impacts that would be considered probable significant adverse impacts. However, as part of phased environmental review, other studies (such as an environmental impact statement) are expected to be published at a later date, which will contain conclusive analysis of impacts and identification of mitigation measures. At this time, the threshold determination for Comprehensive Plan changes can be satisfied through a mitigation measure that indicates the City should implement relevant project-specific mitigation for the viaduct and seawall project.

Dearborn Street (Goodwill) vicinity

Item I would change the Future Land Use Map designation from Industrial Area to Commercial/Mixed Use Area. The magnitude of potential environmental impacts is being examined in a Supplemental EIS for a retail/mixed-use center on the Goodwill property. The Draft of this EIS will be issued imminently for public comment, and a Final EIS will subsequently be prepared in

Fall 2006. As part of phased review, this other study will make conclusions about impacts and identify mitigation measures for significant adverse impacts. At this time, the threshold determination for Comprehensive Plan changes can be satisfied through a mitigation measure that indicates implementation of necessary project-specific mitigation should occur.

Built Environment

Land and Shoreline Use, Height/Bulk/Scale, Housing

Updates to Neighborhood Plans, Urban Centers and Potential Annexation Areas

As non-project actions, no direct impacts to the built environment would occur as a result of the five proposed items in this category, labeled as A-E. However, the status of Items A-C should be reviewed with respect to potential land use and housing-related impacts.

Items A, B and C would tend to reinforce trends encouraging denser infill growth within these urban villages and urban centers. The net result of these changes could be a relatively modest increase in the ultimate density achieved in key parts of the identified areas, especially if future actions are taken to further encourage growth. However, in each case, these are already relatively dense urban areas within Seattle that are generally suitable for additional infill growth, and the resulting land use patterns are not expected to generate significant adverse land use or housing impacts. The change in designation of a 12-block area from Industrial to Commercial/Mixed Use would not create potential use or zoning incompatibilities nor would it significantly affect operation of existing light industrial uses in the area. Additionally, the proposed actions would tend to reinforce the overall strategies for growth that the City has adopted, indicating a general consistency with the approach of the City's Comprehensive Plan. Therefore, no significant adverse land use impacts are identified.

Item D, updating references to an eliminated light rail station, has no significant adverse land use or housing impact implications. Item E, placing a potential annexation area map into the Comprehensive Plan, is categorically exempt from SEPA review (see SMC 25.05.800 F).

Open Space Policy Changes

Item F, allowing for different treatments of yard and open space requirements in urban centers would tend to reinforce the urban village growth themes of the Comprehensive Plan, and could encourage additional development over time that would become more feasible with different yard/open space requirements. Along with future denser development patterns, there would likely be an increased presence of more publicly available open space and parks that could appear more prevalent to persons in a neighborhood, compared to development under existing rules. Within the context of Seattle's urban centers, and given the offsetting condition of additional open space created as a result of new tools such as impact fees, the conclusion is there is only minimal potential for significant adverse land use impacts as a result of this proposed change.

Shoreline-Related Policy Changes

Ferry Terminal

The proposed changes to amend City goals and policies would accommodate future addition of non-water-dependent uses at an existing ferry terminal. The City has the authority to make such changes to its shoreline goals and policies. This site has functioned as an operating pier for more than 120 years, as part of Seattle's working waterfront. The ferry terminal is an important facility in the regional transportation system. The terminal already includes a variety of commercial uses, most of which serve ferry users but some of which (restaurant outlets) also serve on-shore patrons. The proposed expansion of the terminal with other uses would increase its overall functionality and economic viability, and is anticipated to incorporate elements that would support and enhance public access and recreational enjoyment of the shoreline associated with Colman Dock. The proposed amendments are narrowly drawn to affect only the subject site vicinity. As a single entity, the improved terminal complex would continue to function as a ferry terminal that is a key water-dependent use that must be maintained along Seattle's waterfront.

The observations above tend to justify the future development of a non-water-dependent use at the subject site, citing reasons that would possibly reduce the significance of potential impacts of an expanded mixed-use terminal complex on the built environment. However, despite those impact-reducing aspects, there essentially remains a realistic potential for significant adverse impacts as an indirect consequence of the proposed amendments to City goals and policies. At this time, the threshold determination for Comprehensive Plan changes can be satisfied through a mitigation measure that indicates the City should implement relevant project-specific mitigation for the development proposal at Colman Dock.

Central Waterfront

The proposal would accommodate future construction of a highway and seawall replacement within the shoreline environment. Similar to the rationales expressed above for the ferry terminal proposal, there is a realistic potential for significant adverse land use impacts to be generated as an indirect consequence of the proposed amendments to City goals and policies. Such impacts are anticipated to be identified by environmental review for the road and seawall project. At this time, the threshold determination for Comprehensive Plan changes can be satisfied through a mitigation measure that indicates the City should implement relevant project-specific mitigation for the viaduct and seawall project.

Dearborn Street (Goodwill) vicinity

Item I would change the Future Land Use Map designation from Industrial Area to Commercial/Mixed Use Area. The preliminary recommendations for Livable South Downtown planning, issued in March 2006, support a future use of this vicinity in commercial and mixed uses. Also, the magnitude of potential environmental impacts is being examined in a Supplemental EIS for a retail/mixed-use center on the Goodwill property. The Draft of this EIS will be issued imminently for public comment, and a Final EIS will be prepared. As part of phased review, this other study will make conclusions about impacts and identify mitigation measures for significant adverse impacts. At this time, the threshold determination for Comprehensive Plan changes can

be satisfied through a mitigation measure that indicates implementation of necessary project-specific mitigation should occur.

Transportation, Public Services and Utilities

Updates to Neighborhood Plans, Urban Centers and Potential Annexation Areas

As non-project actions, no direct impacts to the built environment would occur as a result of the five proposed items in this category, labeled as A-E. However, the status of Items A-C should be reviewed with respect to potential transportation, public service and utility-related impacts.

If future actions do encourage more intensive growth in the identified areas, and there is a relatively modest increase in the ultimate density achieved, there could be net increases in overall traffic impacts and service and utility demands. However, in each of these cases, past analysis and ongoing work by City departments suggests that sufficient road and utility infrastructure capacity is available or will be provided over the long term. Each of these areas also is well-located to accommodate frequent use of transit as an alternative to single-occupant vehicles, meaning a slight reduction in the potential for adverse traffic impacts, compared to future growth in other areas. Current City regulations and policies will ensure that the potential for significant adverse impacts within these categories will be avoided as growth proceeds over the long term.

Item D, updating references to an eliminated light rail station, has no significant adverse environmental implications. Item E, placing a potential annexation area map into the Comprehensive Plan, is categorically exempt from SEPA review (see SMC 25.05.800 F).

Open Space Policy Changes

The proposed changes in Item F would reduce the burden of on-site locations in urban centers to provide open space and recreational space, which could increase the net overall demands for recreational parks and open space with future development. With the possible future adoption of tools such as impact fees, there would be a mechanism for the City to generate funds from future development to be used to provide additional parks and open space. This would tend to offset the added potential for additional park/open space impacts with future development, as long as funds gathered are effectively used in providing the parks/open space in a timely manner. Therefore, no significant adverse impact potential on parks/open space are identified, nor are any identified with respect to transportation or other public services or utilities.

Shoreline-Related Policy Changes

Ferry Terminal

The proposed changes to amend City goals and policies would accommodate future development at an existing ferry terminal. Such future development would generate additional traffic volumes and could potentially generate significant adverse transportation or traffic impacts in a vicinity that already experiences relatively high volumes of traffic. At this time, the threshold determination for Comprehensive Plan changes can be satisfied through a mitigation measure

that indicates the City should implement relevant project-specific mitigation for the development proposal at Colman Dock.

Central Waterfront

The proposed changes to amend City goals and policies would essentially have the long-term potential for positive impacts on transportation, in that it would facilitate time-efficient redevelopment of the SR 99 highway link. Any traffic disruptions or public service or utility effects that may occur as a result of that project are not pertinent to this environmental determination.

Dearborn Street (Goodwill) vicinity

Item I would change the Future Land Use Map designation from Industrial Area to Commercial/Mixed Use Area. The magnitude of potential environmental impacts is being examined in a Supplemental EIS for a retail/mixed-use center on the Goodwill property. The Draft of this EIS will be issued imminently for public comment, and a Final EIS will be prepared. As part of phased review, this other study will make conclusions about impacts and identify mitigation measures for significant adverse impacts. At this time, the threshold determination for Comprehensive Plan changes can be satisfied through a mitigation measure that indicates implementation of necessary project-specific mitigation should occur.

MITIGATION MEASURES

- To address the potential for significant adverse natural environmental impacts related to policy changes addressing the Colman Dock site, the City should implement mitigation measures identified as needed to adequately mitigate significant impacts of development proposals. The City should also implement mitigation measures to offset significant adverse land use or traffic-related impacts that may be identified.
- To address the potential for significant adverse natural environmental impacts related to policy changes addressing the viaduct and seawall reconstruction project, the City should implement mitigation measures identified as needed to adequately mitigate significant impacts. The City should also implement mitigation measures to offset significant adverse land use impacts that may be identified.

- To address the potential for significant adverse environmental impacts related to policy changes addressing the Dearborn Street (Goodwill) vicinity, the City should require implementation of mitigation measures identified as necessary to adequately mitigate significant impacts of development proposals, such as the proposal under review on the Goodwill property.

DECISION

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030.(2)(c).
- [] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).

Signature: _____ Date: _____
Gordon Clowers, Urban Planner
Department of Planning and Development